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U.S. Department of Justice

United States Attorney Southern District of New York

The Silvio J. Mollo Building One Saint Andrew's Plaza New York, New York 10007

March 22, 2024

BY ECF

Honorable Andrew L. Carter, Jr. United States District Judge Southern District of New York Thurgood Marshall U.S. Courthouse 40 Foley Square New York, New York 10007 USDC SDNY
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Re: United States v. Valeria Ruth HaCohen et al., S1 20 Cr. 648 (ALC)

Dear Judge Carter,

The Government respectfully submits this letter on behalf of the parties to request a 60-day adjournment of the motion briefing schedule in this case, which was previously set at the January 24, 2024 conference. Opening briefs are currently scheduled to be filed on March 25, 2024. The parties are engaged in separate but ongoing negotiations regarding potential resolutions, and the proposed adjournment would conserve judicial resources and economy while those discussions reach their conclusion. The Court has previously excluded time under the Speedy Trial Act through May 16, 2024. (D.E. 124.)

Accordingly, the Government respectfully requests, with the consent of the parties, that the Court grant the parties' request for a 60-day adjournment of the motion schedule.

Respectfully submitted,

DAMIAN WILLIAMS United States Attorney

by: ____/s/_ Michael D. Lockard

Nicholas S. Bradley Assistant United States Attorneys (212) 637-2193/-1581

The application is **GRANTED**.

So Ordered.

Ansha 7 Cak 23/26/24

cc:

Counsel of record (by ECF)